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**From:** Chancellor, Erin [chancellor.erin@epa.gov]  
**Sent:** 4/2/2019 8:20:51 PM  
**To:** Gray, David [gray.david@epa.gov]  
**Subject:** RE: FRI AM - International Terminals Corporation Fire

Are these still happening? This is the last one I've received.

Erin E. Chancellor  
Chief of Staff | Office of the Regional Administrator  
U.S. EPA Region 6  
214.665.2112 (o) | 214.601.1292 (c)  
[chancellor.erin@epa.gov](mailto:chancellor.erin@epa.gov)

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**From:** Gray, David  
**Sent:** Friday, March 29, 2019 10:05 AM  
**To:** Konkus, John <konkus.john@epa.gov>; Grantham, Nancy <Grantham.Nancy@epa.gov>; Lyons, Troy <lyons.troy@epa.gov>; Frye, Tony (Robert) <frye.robert@epa.gov>; McFaul, Jessica <mcfaul.jessica@epa.gov>; Abboud, Michael <abboud.michael@epa.gov>; Hewitt, James <hewitt.james@epa.gov>; Schiermeyer, Corry <schiermeyer.corry@epa.gov>; Idsal, Anne <idsal.anne@epa.gov>; Chancellor, Erin <chancellor.erin@epa.gov>  
**Subject:** FRI AM - International Terminals Corporation Fire

All – please note that our updates will transition to once daily going forward.  
David



**Intercontinental Terminals Company (ITC) Fire Morning Update  
Deer Park, Texas  
March 28, 2019 1200 – March 29, 2019 0400**

**Incident Management Objectives:**

**Objective 1:** Ensure the health and safety of the public and response personnel.

**Objective 2:** Establish an incident management structure and processes employing the Incident Command System to enable effective overall management of the event with deployment of resources (staff and equipment) in a rapid, focused and well-coordinated manner.

**Objective 3:** Encourage a collaborative federalism approach, where Federal, State, Tribal, and local governments interact cooperatively and collectively to solve common problems.

**Objective 4:** Take actions to assess the on-site and off-site impacts during the emergency response phase of this incident. Provide this information to state and local authorities to assist them in their decision to protect the local citizens.

**Objective 5:** Conduct activities to prevent off-site releases from the ITC Tank Farm.

**Objective 6:** Respond to, mitigate and recovery off-site releases from the ITC Tank Farm.

**Objective 7:** Maintain open communication with Regional management

#### **Incident Overview:**

On March 17, 2019, an above ground storage tank containing Naphtha, caught fire at the Intercontinental Terminal Company (ITC), LLC facility in Deer Park Texas. The ITC facility consists of 15 80,000-barrel capacity above ground storage tanks containing petroleum products including Naphtha, Xylene, Toluene, Gasoline Blendstock, and Base Oil. Eleven of the 15 80,000-barrel capacity above ground storage tanks on site were involved in the fire, resulting in the release of contaminants into the atmosphere, as well discharging the contents of the tanks to drainage pathways. Firefighting water and foam potentially containing petroleum products were released from an outfall due to accumulation of water from firefighting efforts. Various firefighting organizations assisted in putting out the fire utilizing a variety of firefighting foams.

A partial breach of the tank farm containment wall on the northeast side near Tank 80-7 occurred at approximately 12:00 pm on March 22, 2019, to the ditched area and into Tucker Bayou. Additional boom was placed along the ditch leading to Tucker Bayou and Buffalo Bayou (Houston Ship Channel). The Responsible Party's contractor has rebuilt the containment wall using clay material.

At approximately 3:40 pm on March 22, 2019, three tanks reignited. The fire spread from the containment area through the breached containment wall into the ditch along Tidal Road. Foam was applied to the tanks and the ditch to extinguish the fire.

During and after the fire and the breach of the secondary containment, several readings of benzene above 1.0 ppm were detected (highest was 16.5 near National Tank Services) by the various entities conducting air monitoring through the afternoon and night. These readings were located along the ship channel.

The United States Coast Guard (USCG) Captain of the Port is continuing the controlled open for the Ship Channel on March 26, 2019, with traffic during the daytime only. Decontamination vessels are being positioned to help ships that may have residue on the hulls.

Due to the initial fires and subsequent releases, shelters in place have occurred throughout the week of March 17, 2019.

#### **Executive Overview:**

- As of 8:30 pm on March 28, 2019, ITC had recovered 36,611.6 barrels (bbls) of material from on-water operations. As of 6:00 pm on March 28, 2019, 40,385 bbls of material had been recovered from the tank farm. Approximately 128 cubic yards of contaminated solids (personal protective equipment (PPE), boom, and absorbent pads) had been removed.
- On March 28, 2019, tanks 80-2 and 80-3 were emptied into secondary containment and into the 80s separator. Tank 80-2 was estimated to have approximately 5,400 bbl remaining prior to having the sump line opened. Tank 80-3 was estimated to have 5,400 bbl of material remaining in it, prior to the opening of its sump line. At 8:30 pm on March 28, 2019, emptying of tanks 80-14 and 80-15 had begun.
- At 10:00 pm on March 28, 2019, ITC expressed concerns to TCEQ and EPA about overflowing the secondary containment due to draining operations and foaming operations on tanks. Pumping out of the containment cannot keep up with the draining of tanks. TCEQ and EPA advised ITC that it would be acceptable to pump the material into their wastewater tanks in an emergency, but that the material would be disposed of as waste, and not run through their treatment plant. ITC agreed to that option.
- As of March 29, 2019, ITC Deer Park has not resumed operations, and does not have an estimated date of when they may resume operations.
- Foaming of the secondary containment, to prevent reignition and reduce emissions, continues as necessary.

- Several entities including TCEQ, EPA, the 6<sup>th</sup> Civil Support Team (CST), and ITC continue to conduct air monitoring around the tank farm, in adjoining industrial areas, and communities downwind from the facility.
- On March 28, 2019, the Strike Team, comprised of CST on behalf of TCEQ, EPA, and CTEH were sent to the areas around Channelview (north of the site) due to elevated readings of benzene during the night. Unified Command and Harris County were kept apprised of the readings. No readings were sustained over 1.0 ppm of benzene.
- EPA conducted air sampling using the Trace Atmospheric Gas Analyzer (TAGA) on March 28, 2019. The TAGA analyzed the air samples for benzene, toluene and xylene. The TAGA air sampling results were compared to the Texas Commission on Environmental Quality (TCEQ) short-term Air Monitoring Comparison Values (AMCVs) and found no exceedances of the short-term AMCVs for benzene, toluene and xylene.
- EPA conducted handheld air monitoring from March 28, 2019 (12:00 pm) to March 29, 2019 (4:00 am) at 49 locations in areas located west and northwest of the Site as well as Buffalo Bayou. Results were reported above the detection limit at five locations for total volatile organic compounds (VOCs) and four locations for benzene. Benzene was detected at two of these locations above the short-term AMCVs for benzene (0.18 ppm). EPA will conduct additional air monitoring and deploy the Trace Atmospheric Gas Analyzer (TAGA) to determine if the short-term AMCV for benzene continues to be exceeded.
- ITC continued air monitoring on March 28 (midnight to midnight); there were 3,447 VOC readings (615 detections) with and 2,416 benzene readings (552 detections).
- TCEQ continued handheld air monitoring between 2:00 pm and 10:00 pm on March 28 (34 readings). No significant readings were detected.
- Unified Command developed, reviewed, and approved the Incident Action Plan (#7) for the next operational period.
- Vacuum truck operations at Tucker Bayou and the outfall ditch continue on a 24-hour basis.

#### **Coordination with State Agencies:**

On March 17, 2019, in response to a tank fire at the ITC, federal, state and local agencies joined ITC in a Unified Command. Multiple agencies including the United States Coast Guard, the TCEQ, and Harris County Pollution Control Services supported the response effort.

#### **EPA Resources:**

<b>Personnel</b>	<b>EPA R6 Dallas</b>	<b>ITC Deer Park</b>	<b>Total</b>
<b>EPA Region 6</b>	9	7	<b>16</b>
<b>EPA Non-Region 6</b>	0	4	<b>4</b>
<b>START</b>	1	14	<b>15</b>
<b>Other Contractors</b>	0	8	<b>8</b>
<b>Total</b>	<b>10</b>	<b>33</b>	<b>43</b>

#### **Additional Information: Air Monitoring and Water Sampling locations:**

